

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

United States of America

v.

**Rocio Sanchez AKA
Rocio Chavira**

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No. 1:21-cr- 200-LM-01

Indictment

The Grand Jury charges:

At all times relevant to this indictment:

1. The “National Passport Center” is a facility operated by the United States Department of State, Bureau of Consular Affairs, for the filing, processing, and adjudication of United States Passport Applications (forms **DS-11**) and United States Passport Renewal Applications (forms **DS-82**), which are used to apply for passport renewals by mail. The National Passport Center is located at 207 International Drive, Portsmouth, New Hampshire.

2. Title 22, Code of Federal Regulations, Section 51.2 provides that a passport may be issued only to a United States national. Under Title 22, Code of Federal Regulations, Section 50.1(d), a national is a citizen of the United States or a noncitizen owing permanent allegiance to the United States. A non-citizen national is someone who was: (i) born in American Samoa or Swain’s Island; (ii) found in American Samoa or Swain’s Island at a young age; (iii) a child of a non-citizen United States national who meets certain physical presence or residence requirements; or (iv) born in the Commonwealth of the Northern Marianas Islands and opted to become a non-citizen national instead of a citizen of the United States. 8 U.S.C. §§ 1408, 1101(a)(29); Public Law 94 – 241 § 302.

3. The defendant, **Rocio Sanchez AKA Rocio Chavira**, was neither a citizen nor a national of the United States.

COUNT ONE

[False Statements – 18 U.S.C. § 1001(a)(2)]

Background

4. Paragraphs 1 through 3 are re-alleged.

False Statement

5. In and around April 2021 to May 2021, in the District of New Hampshire and elsewhere, the defendant,

**Rocio Sanchez
AKA Rocio Chavira,**

in a matter within the jurisdiction of the United States Department of State, an agency of the executive branch of the Government of the United States, knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation in connection with a United States Passport Application (form DS-11). **Sanchez** executed the passport application, which was subsequently received at the National Passport Center. To induce and secure the issuance of a United States Passport, **Sanchez** falsely stated on the application a name, date of birth, place of birth, and social security number that were not her own. **Sanchez** knew that this statement and representation was false when made.

In violation of Title 18, United States Code, Section 1001(a)(2).

The Grand Jury charges further:

COUNT TWO

[Aggravated Identity Theft – 18 U.S.C. § 1028A(a)(1)]

6. Paragraphs 1 through 3 are re-alleged.

7. In and around April 2021 and May 2021, in the District of New Hampshire and elsewhere, the defendant,

**Rocio Sanchez AKA
Rocia Chavira,**

did knowingly use, without lawful authority, a means of identification of another person, namely, the name, date of birth, and social security number of another person, Rocia Chavira, during and in relation to a felony violation of Title 18, United States Code, Section 1001(a)(2), as alleged in Count One of this Indictment.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

A TRUE BILL

/s/ Foreperson
Grand Jury Foreperson

JOHN J. FARLEY
Acting United States Attorney

/s/ Anna Dronzek
Anna Dronzek
Assistant United States Attorney

Date: December 13, 2021